

**CHRISTENSEN JAMES & MARTIN, CHTD.**

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*Attorneys for Plaintiff Board of Trustees of the  
Painters & Floorcoverers Joint Committee*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

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BOARD OF TRUSTEES OF PAINTERS  
& FLOORCOVERERS JOINT  
COMMITTEE,

Plaintiff,

vs.

CHRISTOPHER B. ARNOLD, an  
individual; CBA INVESTMENTS, LLC,  
a Nevada limited liability company; HI-  
CON, INC., a California corporation; RM  
GENERAL CONTRACTING, INC., a  
Nevada corporation; DOES I-X, inclusive;  
ROE ENTITIES I-X, inclusive,

Defendants.

CASE NO.: 2:17-cv-01366-MMD-GWF

**STIPULATION AND JOINT**  
**MOTION TO EXTEND DISCOVERY**  
**CUT-OFF DATE**  
**[Second Request]**

The Plaintiff, BOARD OF TRUSTEES OF PAINTERS & FLOORCOVERERS  
JOINT COMMITTEE ("Plaintiff" or "PFJC"), by and through its attorneys, Christensen  
James & Martin, Chtd., and Defendant, HI-CON, INC. ("Hi-Con"), by and through its  
attorneys, Dickinson Wright PLLC, pursuant to LR 26-4 and LR IA 6-1, hereby stipulate  
and jointly move for an extension of the discovery cut-off date, as follows:

1. On January 17, 2018, the Plaintiff filed a Motion to Extend Discovery  
Cut-Off Date [First Request] [ECF No. 24].

2. On January 19, 2018, the Court entered an Order [ECF No. 25] denying the Motion without prejudice for failure “to provide adequate certification regarding the parties’ meet and confer efforts.”

3. The Parties have met and conferred and agree that extension of the discovery cut-off date is appropriate for the reasons set forth in the Motion.

4. The Parties will use the extra time to complete remaining discovery and work toward completing a settlement.

5. The Parties request that the Discovery Cut-Off Date of January 31, 2018 be extended 45 days to Monday, March 19, 2018.

6. Following denial of the first request without prejudice, this is the parties’ second request for extension of the discovery cut-off date.

**CHRISTENSEN JAMES & MARTIN**

By: /s/ Wesley J. Smith  
Wesley J. Smith, Esq.  
Nevada Bar No. 11871  
*Attorneys for Plaintiff Board of Trustees  
of the Painters & Floorcoverers Joint  
Committee*

Date: 1/24/2018

**DICKINSON WRIGHT PLLC**

By: /s/ Eric D. Hone  
Eric D. Hone, Esq.  
Nevada Bar No. 8499  
*Attorneys for Defendant Hi-Con, Inc.*

Date: 1/24/2018

IT IS SO ORDERED.

  
United States Magistrate Judge

Date: 01/25/2018